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**Cc:** Amoroso Amy; Huber Audie; Swift Brett; Andrews Carrie; (b) (6); MELCHER Curt; (b) (6); LLOYD Diane; Springer Dick; Marriott Debrah; Bartlett Heather; Chip Humphrey/R10/USEPA/US@EPA; (b) (6); Fenton Jason; (b) (6); (b) (6); Brown Jevra; ANDERSON Jim M; Paul Jim; Kincaid James; SHEAHAN Joseph E; Shaw John; (b) (6); Curtis Julie; Callahan-Grant Megan; O'Connor Mike; Kennedy Mike; Pustis Nancy; HENRY Randy H; Seifried Robin Bellanca; KEPLER Rick J; Zinszer Shawn; Sheryl Stohs/R10/USEPA/US@EPA; (b) (6); (b) (6)  
**Subject:** Comments on Confined Disposal Facilities  
**Date:** 08/21/2012 12:15 PM

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Hello RAC members,  
Please find the attached comment for your review.  
Thanks,  
Chris

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**From:** (b) (6)  
**Sent:** Saturday, August 18, 2012 4:55 PM  
**To:** CASTELLI Chris  
**Cc:** (b) (6)  
**Subject:** RRAC meeting September 6th

As I know you have stated this is for adaption on a state wide basis and each confined disposal site or submerged in water site are different and thus no one plan fits all. I will comment on this type of site in general and then on the proposed site at T4, slip 1. The river and surrounding area is ours, how we use it will reflect on us for generations to come. We have pollution in the Willamette River, much of it industrial waste deposited over 100 years. Many of those companies responsible no longer exist but now we need to reclaim the river and remove as much pollutants as economically possible while making the river a safe place to recreate, navigate, fish and pursue commerce.

The shorter the distance you move contaminated material the less the chance of accidental spillage and the lower the cost of removal but. you now have material buried under water or adjacent to water that is a public trust. In some cases you can no longer allow anchorage or even boat traffic. Such sites have to be monitored, some for hundreds of years at a loss of trust value and now at danger of leakage and renewing hazards because some chemicals, DDT, PCB's and agent orange do not break down. We are looking at a catastrophic earthquake that could and by science best guest hit the NW in the next 50 years. I have heard comments about if that happened we would have worst problems than a leaking CDF. Transportation failure, power grids down, lost communication etc.,. Do we want to deal with that and failed CDFs as well and try to recover waste that is now spreading out and may never be recoverable.

We are not talking about a cap. We are talking about a garbage dump of toxic chemicals, you cannot separate every scoop that goes in and you are stuck with it for ever. The best thing in my opinion is to remove it to some dryplace with low rainfall and use a liner and monitor the waste. Price is higher, always a chance of accident in moving waste but much less than placing the material back in harms way and losing the trust values. I am purposely being brief but, I wonder if the people who propose these things would still do so if it was in their own neighborhood and they were not being paid for their conclusions.

T4, Slip 1 First this has never been tried before on a moving river and the proposal is for an unlined CDF which they plan to build a barrier containing thousands of gallons of water which because of the clean water act they can not dump. They say over the years the waste, PCB,s and other toxic chemicals will mix with water and soil and make a slurry which will bind the chemicals in place and allow the water to evaporate and leach out of the CDF. I believe they have tried this back east and had leakage problems. Adjacent to the proposed site is the largest wintering site for sturgeon in the Willamette River and leakage would further contaminate the food source for these prehistoric fish which are close to being listed as an endangered species. The proposal now is to reduce sturgeon fishing to two fish per year. There is currently no plan to remove the resident fish from this slip so thousands of fish will be destroyed. Plus the surrounding community opposes have the CDF in their neighborhoods and had believed they had stopped this. This proposed CDF holds 875,000 cu yds of waste.

Submerged Disposal Facility - Swan Island This facility would be different as it would take up about 1/4 of the Swan Island lagoon, nearly a million cu yds of fill. It would be filled and capped, most of the material would come from the shipyards and surrounding harbor. Because it would be subject to river tides and somewhat protected from floods it would be less subject to some damage but, again it would be for ever. It would need to be monitored, we would lose the BES boat ramp only one of three for the Willamette in the city. The area though under water it would be closed to motor traffic and to anchoring. It is currently one of the major spawning areas for warm water fish in the lower harbor and again you would have all kinds of toxic materials buried in once was the main channel of the Willamette.